

Before The  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

RATE ADJUSTMENT DUE TO EXTRAORDINARY  
OR EXCEPTIONAL CIRCUMSTANCES

Docket No. R2013-11R

**MOTION OF THE UNITED STATES POSTAL SERVICE FOR LEAVE TO  
REPLY TO GCA'S OPPOSITION TO POSTAL SERVICE MOTION TO STRIKE**  
(July 16, 2015)

On July 8, 2015, the Postal Service filed a Motion to Strike quantifications provided for the first time in their Reply Comments by GCA/NPPC ("GCA") and by Valpak. On July 14, 2015, GCA filed its Opposition to the Motion to Strike. The Postal Service hereby moves for leave to very briefly respond to that Opposition.

Leave to respond is warranted for two reasons. First, the GCA Opposition mischaracterizes the Motion to Strike. On page 2 of the Opposition, GCA incorrectly claims that the Postal Service "does not contend" that GCA's new quantification materials do not "simply present in a numerical format the methodology described in the GCA/NPPC initial comments." GCA reaches this erroneous conclusion only by ignoring the portions of the Motion to Strike alluding to "simple, obvious, and egregious" errors, including "computational errors." Motion to Strike at 2-3. The root of the computational errors is exactly a failure to apply the general steps broadly outlined in the GCA Initial Comments when creating actual spreadsheet formulas. By no means did GCA do what it

had attempted to describe earlier, and there was absolutely no way to know this until the actual spreadsheets appeared with the Reply Comments.

The second reason is not unrelated to the first reason. GCA emphasizes on page 4 that the Motion to Strike did not identify any specific computational errors. In this instance, GCA ignores the fact that the purpose of the Postal Service's Motion to Strike was to challenge the procedural unfairness by which it had been deprived of its required opportunity to evaluate new quantitative analyses that could have and should have been submitted earlier. The Postal Service was not attempting to resolve procedural irregularities by itself seizing an unauthorized opportunity to addressing the merits of the very material it sought to strike. The Postal Service consciously attempted to avoid including any content that would have foreclosed the ability of the Commission (if it wished) to keep the discussion limited to the procedural level. We did not set forth the specific quantification errors in our Motion to Strike only because we did not believe it was procedurally appropriate to do so. GCA's attempt to imply that such an approach constitutes a deficiency in the Motion to Strike warrants reply.

Therefore, for the above reasons, the Postal Service respectfully requests

that its motion for leave to file a short reply to the GCA Opposition to the Motion to Strike be granted.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Richard T. Cooper  
Managing Counsel, Corporate & Postal  
Business Law

Daniel J. Foucheaux, Jr.  
Chief Counsel, Pricing & Product  
Support

R. Andrew German  
Managing Counsel, Legal Strategy

Eric P. Koetting

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 277-6333  
July 16, 2015